

May 15, 2009  
via electronic filing

Ms. Rosa G. Lewis  
Senior Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission  
Washington, D.C. 20463

Re: SEIU COPE Amended May Monthly Report (4/01/08-4/30/08), received 12/19/08

Dear Ms. Lewis:

This is in response to your letter to SEIU COPE, dated April 15, 2009.  
In your letter, you ask five questions regarding the above referenced Monthly Report.

The first question relates to the beginning cash balance roll forward from prior report. This problem will be corrected when the April report is amended and corrected balances rolled forward.

Your second question asks about an independent expenditure for a billboard ad. Our amended report will correct the characterization of this expenditure to reflect that it was to support Barack Obama in the general election, not in the Iowa primary as originally described in error. Other independent expenditures that used this vendor were reported correctly -- including 48 hour notices -- at the time. However, it appears that this expenditure was paid for via wire transfer in a different part of the accounting department and was overlooked until the amended monthly report was filed.

In response to your third question, the amended report we will be filing will modify the expenditures described as 'canvass staff and expenses' to clarify that they were payments for 'door-to-door voter ID and get out the vote efforts'.

Your fourth question concerns independent expenditures with Compass Media as the payee. There were 15 different items reported in this period and we will modify the few that do not have notes to clarify how each expenditure relates to the 48 hour notices filed.

Your final question related to expenditures which appear to have been distributed after the relevant primary date. As discussed above, the expenditure for billboards will be amended to clarify that they were for support in the general election (the billboards were reserved from April thru November) not in the primary.

Please feel free to contact me if you have any further questions

Sincerely,

Robert Hauptman  
for SEIU COPE